

1 ADAM PAUL LAXALT
2 Attorney General
3 VIVIENNE RAKOWSKY
4 Deputy Attorney General
Nevada Bar No. 009160
5 555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
6 (702) 486-3103
VRakowsky@ag.nv.gov

6 PETER KEEGAN
7 Deputy Attorney General
8 Nevada Bar No. 12237
9 100 N. Carson Street
Carson City, Nevada 89701
(775) 684-1153

10 PKeeган@ag.nv.gov
11 Attorneys State Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HELEN ARMSTRONG,

Plaintiff(s),

vs.

TERRY REYNOLDS, in his individual capacity and as Deputy Director of Nevada Department of Business and Industry; STEVE GEORGE, in his individual capacity and as an Administrator of the Nevada Division of Industrial Relations; JESS LANKFORD, in his individual capacity and as Chief Administrative Officer of Nevada OSHA; and LARA PELLEGRINI, in her individual capacity and as Whistleblower Chief Investigator of Nevada OSHA; DOES I through X, unknown individuals, and ROES XI through XX, entities, government agencies, corporations, or other companies and/or businesses currently unknown.

Defendant(s).

Case No. 2:17-cv-02528

**STIPULATION AND ORDER TO
CONTINUE DATE TO RESPOND TO
AMENDED COMPLAINT [#57]
UNTIL MAY 8, 2018**

FIRST REQUEST

111

**STIPULATION AND ORDER TO CONTINUE DATE TO RESPOND TO
AMENDED COMPLAINT [#55]
UNTIL MAY 8, 2018**

IT IS HEREBY STIPULATED AND AGREED by and between DEFENDANTS,
TERRY REYNOLDS, STEVE GEORGE, JESS LANKFORD, and LARA PELLEGRINI, by
and through counsel, Adam Paul Laxalt, Attorney General, Deputy Attorney General
Vivienne Rakowsky, Deputy Attorney General Peter Keegan, and PLAINTIFF, HELEN
ARMSTRONG, by and through counsel, Joel F. Hansen of Cooper Levenson, P.A., that the
date for DEFENDANTS to respond to the Amended Complaint [#55] will be Tuesday, May
8, 2018. The parties further agree and stipulate that PLAINTIFF shall have until June 1,
2018, to respond to any motion filed by DEFENDANTS.

11 Good cause exists to continue the date to respond to the Amended Complaint [#55]
12 based on the time necessary to gather information from four different State Defendants
13 and respond.

14 This Stipulation is entered into this 6th day of April 2018.

COOPER LEVISON, P.A.

**ADAM PAUL LAXALT,
Attorney General**

/s/ Joel F. Hansen
JOEL F. HANSEN, ESQ.
Nevada Bar No.: 1876
1835 Village Center Circle
Las Vegas, Nevada 89134
(702) 366-1125
Attorneys for Plaintiff

/s/ Vivienne Rakowsky
VIVIENNE RAKOWSKY, DAG
Nevada Bar No.: 009160
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
(702) 486-3103
Attorneys for Defendants

IT IS SO ORDERED.

ORDER

DATED this April 10,

2018.

UNITED STATES MAGISTRATE JUDGE